

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
THIRD REGION

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ACE MASONRY, d/b/a ACE UNLIMITED and  
BELLA MASONRY, LLC, alter egos and  
BELLA FURNITURE SOLUTIONS, INC., and  
HENRY BELLAVIGNA, LISA BELLAVIGNA,  
ROBERT P. BELLAVIGNA AND  
DOMENICK BELLAVIGNA, Individuals

and

INTERNATIONAL UNION OF BRICKLAYERS  
AND ALLIED CRAFTWORKERS, LOCAL NO. 3

and

LABORERS INTERNATIONAL UNION, LOCAL NO. 785

and

NORTHEAST REGIONAL COUNCIL OF CARPENTERS

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CASES

03-CA-073540

03-CA-074523

03-CA-073549

03-CA-074531

03-CA-079606

**RESPONDENT'S EXCEPTIONS TO THE DECISION  
OF THE ADMINISTRATIVE LAW JUDGE**

Pursuant to Section 102.46(a) of the Board's Rules and Regulations, Counsel for the Respondents hereby submits these Exceptions to the Decision of Administrative Law Judge Raymond P. Green (ALJ), dated November 25, 2014, in the above-captioned cases.

**Exception 1:**

The ALJ's finding that Robert Bellavigna is personally liable. (Pg. 13, Lns 8-12). The exception is based on a lack of evidence and misapplication of the law.

**Exception 2:**

The ALJ's finding that Lien Law trust funds could be used to pay for the debts at issue.  
(Pg. 5, Lns 1-16). The exception is based on the misapplication of the law.

**DATED** at Brewerton, New York this 13<sup>th</sup> day of January, 2015.

Respectfully submitted,

/s/ Jason B. Bailey  
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